

1 **WOODNICK LAW, PLLC**

2 [REDACTED]  
3 [REDACTED]  
4 *Gregg R. Woodnick, #020736*  
5 *Isabel Ranney, #038564*  
6 *Attorney for Defendant*

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
8 **IN AND FOR THE COUNTY OF MARICOPA**

9 In Re the Matter of:

Case No.: FC2023-052114

10 [REDACTED]

11  
12 Plaintiff,

**AMENDED MOTION FOR RELIEF**  
**FROM JUDGEMENT BASED ON**  
**FRAUD**

13 And

(Assigned to the Honorable Julie Mata)

14 **CLAYTON ECHARD,**

15 Defendant.  
16  
17

18 Defendant, **CLAYTON ECHARD**, by and through counsel undersigned and pursuant  
19 to Rule 2, *Arizona Rules of Protective Order Procedure* (ARPOP), which invokes Rule  
20 60(b)(3), *Arizona Rules of Civil Procedure* (ARCP), or, in the alternative, Rule 85(d)(3),  
21 *Arizona Rules of Family Law Procedure* (ARFLP), hereby files his **Amended** Motion for  
22 Relief from Judgment.  
23

24  
25 [This Motion is Amended solely in an effort to streamline litigation and focus on  
26 the upcoming trial. While, as addressed in Exhibit 4, this amendment is legally  
27 unnecessary, it is being provided to avoid further distraction from the core issues. *See*  
28

1 attached Exhibit 1. The sole amendment, other than changes to the Judge and  
2 Petitioner’s counsel, can be found on page three and notes that Petitioner was seen on  
3 November 14, 2023 for non-pregnancy related care at MomDoc months after she claims  
4 she miscarried.]  
5

6 On October 6, 2023 and October 25, 2023, Plaintiff committed fraud when she filed  
7 her underlying Petition for Order of Protection and then testified before Judge Doody under  
8 the fraudulent pretense that she was pregnant with Defendant’s “twins” and that Defendant  
9 was “cyberbullying her” by posting her “medical records” online. To be clear, **Plaintiff was**  
10 **never pregnant by Defendant** as they did not have penetrative sexual intercourse.  
11

12 Specifically, during a deposition for the paternity/establishment matter currently  
13 pending before Judge Mata (FC2023-052114), Plaintiff **admitted to modifying** medical  
14 records and **claimed she had a miscarriage in September – predating the filing of the**  
15 **OOP**. In her own words: Plaintiff “*did change the top of that [sonogram] from Planned*  
16 *Parenthood to SMIL [...] I added my name in the – in the facility name, correct.*” (**Exhibit 1,**  
17 **pages 81, 88**). Relevant here, Plaintiff tampered with the same sonogram this Court found to  
18 be part of the single act of Domestic Violence required to justify granting the Order of  
19 Protection. Meaning, she submitted to this court, and this court explicitly relied upon, a fraud.<sup>1</sup>  
20  
21  
22

23 To date, in the contemporaneous Establishment matter, Plaintiff has provided no  
24 verifiable medical evidence to support her alleged twin pregnancy and has admitted that the  
25

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26  
27 <sup>1</sup>Through the discovery process, a very disturbing hobby of Plaintiff modifying/creating  
28 documents she purports to be medical records (and legal correspondence) has been identified.

1 ultrasound at the core of this Court’s basis for granting the Protection Order was *de facto*  
2 fraudulent. **Months after Petitioner claims she miscarried, in November of 2023,**  
3 **Petitioner was seen at MomDoc who provided non-pregnancy related gynecological care**  
4 **and who confirmed that Petitioner was not pregnant.** Moreover, to date, every obstetrician  
5 and gynecologists Plaintiff testified (court proceedings and deposition) to being seen for her  
6 (fake) pregnancy have indicated they have **no** records as she was **never** seen as a patient.  
7 *Startlingly*, the source of the sonogram that this Court relied on was allegedly from Southwest  
8 Medical Imaging (SMIL), which has (independent of Plaintiff’s admission to doctoring the  
9 image) confirmed there are no records of the alleged sonogram.)<sup>2</sup>

10 Further emphasizing the extreme fraud on this court, notwithstanding sharing *other*  
11 “sonograms” of the alleged “twin” pregnancy (that curiously match up with sonograms and  
12 YouTube videos posted from years ago *online*), Plaintiff has now denied the existence of all  
13 other sonograms. (**Exhibit 1, page 86**). When confronted with science and the opaque lack of  
14 evidentiary support at the deposition, Plaintiff admitted that she *never sought OBGYN or*  
15 *related care* for the pregnancy further demonstrating the fraud on this court (and in the  
16 collateral proceeding).

17 Plaintiff was never pregnant and all allegations stemming from the fictitious pregnancy  
18 are fraudulent. As a result of Plaintiff’s gross and consistent fraud, the entire matter is tainted  
19  
20  
21

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22 <sup>2</sup> For clarity, Plaintiff testified on March 1, 2024 that she obtained the sonogram on July 7,  
23 2023, at Planned Parenthood in Mission Viejo, California and then edited medical records to  
24 add her name and falsely attribute it to Southwest Medical Imaging (SMIL). Regardless of  
25 the “source,” neither SMIL nor Planned Parenthood have any records for any ultrasound  
26 appointment for Plaintiff.  
27  
28



1 as neither Defendant nor the Court had a full and fair opportunity to litigate and discharge  
2 their respective duties.

3  
4 As and for his Motion, Defendant states as follows:

5 I. **BACKGROUND**

6 1. On October 6, 2023, Plaintiff obtained an *ex parte* Order of Protection against  
7 Defendant (**Exhibit 2**) and indicated that “*one party was pregnant by the other.*” Her Order  
8 alleged, among other things, that Defendant was “*cyberbullying*” her on Reddit and posting  
9 “*private and confidential information, including [...] medical history*” that he could only have  
10 access to because of their paternity case surrounding claim that she was “*pregnant with his*  
11 *twins.*” The entirety of Plaintiff’s allegations in her Order of Protection surrounds the  
12 existence of medical evidence to support her fictitious pregnancy.  
13  
14

15 2. On October 25, 2023, a contested hearing was held before Judge Doody.  
16 Plaintiff testified to having attended various medical appointments to “confirm” her  
17 pregnancy, including the ultrasound appointment for the sonogram at issue and specifically  
18 relied on by this court. This was a lie as the sonogram was fabricated and medical providers  
19 have affirmed that Plaintiff never attended any pregnancy-related appointments.  
20  
21

22 3. The same date, the Court granted Plaintiff’s Order of Protection solely based on  
23 the following image posted below, which Defendant allegedly posted anonymously on Reddit  
24 (which Defendant vehemently denies) and Plaintiff testified contained a sonogram that she  
25 “only” sent Defendant. FTR Oct. 25, 2023 at 10:01:17 a.m. (**Exhibit 3**). **This is either the**  
26  
27  
28



1 same sonogram Plaintiff has admitted to changing and that the alleged source<sup>3</sup> of the  
2 sonogram has no records of *or* one of the other sonograms that Plaintiff has testified she  
3 did not obtain (see Exhibit 1). (Parenthetically, Plaintiff (herself) *also* posted all the alleged  
4 sonograms on a public DropBox on Reddit *and* emailed the “records” to various  
5 journalists/media).

## 7 II. RELEVANT LAW

8  
9 Where not inconsistent with the *Arizona Rules of Protective Order Procedure*  
10 (ARPOP), Rule 2 invokes the *Arizona Rules of Family Law Procedure* (ARFLP) to  
11 “protective order matters heard in in conjunction with pending family law cases” and the  
12 *Arizona Rules of Civil Procedure* (ARCP) for “all other cases.” Here, as the ARPOP does  
13 not include rules for requesting a new trial or setting aside a judgment, Rule 85(d)(3) ARFLP  
14 and Rule 60(d)(3) ARCP are invoked to the extent not inconsistent.<sup>4</sup>

15  
16 Under both Rule 85(d)(3) ARFLP *or* Rule 60(d)(3) ARCP, the Court may relieve a  
17 party from a judgment based on “*fraud (whether previously called intrinsic or extrinsic,*  
18 *misrepresentation, [and] other misconduct.*” Additionally, both Rules permit a motion to be  
19 made on the basis of fraud “*within a reasonable time [...] no more than 6 months after the*  
20 *entry of the judgment.*”  
21  
22  
23  
24  
25

26 <sup>3</sup> Again, the source is either SMIL according to the insignia or Planned Parenthood, who,  
according to Plaintiff, was the original source.

27 <sup>4</sup> Although the hearing for Plaintiff’s Order of Protection was arguably *not* heard in  
28 conjunction with the family court matter and the ARFLPs are likely *not* invoked, Defendant  
cites to Rule 85(d)(3) in the alternative to protect his right to relief.

1 Fraud, as defined by Rule 85(d)(3) ARFLP/Rule 60(b)(3) ARCP, can be either intrinsic  
2 or extrinsic; both justify relief from a judgment. Extrinsic fraud is “fraud upon the court,” and  
3 concerns the procurement of a judgment. Extrinsic fraud has “*effect of which prevents a party*  
4 *from having a trial, or from presenting all of his case to the court, or which operates, not*  
5 *upon matters pertaining to the judgment itself, but to the manner in which it is procured [...]*”  
6 *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965). Conversely, intrinsic fraud “pertains  
7 to matters of judgment itself” and therefore is concerned solely with fraudulent conduct that  
8 occurs within the proceeding. *Robertson v. Teel*, 513 P.2d 977 (Ariz. App. 1973). Both forms  
9 of fraud constitute the “fraud” for the purposes of Rule 85(d)(3) ARFLP/Rule 60(b)(3) ARCP.

### 10 III. ARGUMENT

#### 11 **Plaintiff committed fraud in her October 6, 2023, Petition for Order of Protection.**

12 Plaintiff committed fraud (extrinsic) when she filed her Petition, which the Court relied on in  
13 order to grant the Order, and falsely claimed she was pregnant by Defendant. In her Petition,  
14 Plaintiff alleged that (1) Defendant had threatened her “since discovering [she] was pregnant,”  
15 (2) Defendant had posted “personal and sensitive information” about her because of their  
16 paternity case; (3) Scottsdale PD had called Defendant; (4) Defendant was anonymously  
17 posting “private and confidential information, including facts about [her] medical history”  
18 and (5) Plaintiff feared for her safety. **All of these allegations are fraudulent.**

19 Plaintiff was never pregnant – the parties never had intercourse. Plaintiff has provided  
20 no verifiable medical records to confirm her pregnancy (because none exists) and *every*  
21 provider she testified to being seen by has confirmed they have no records for Plaintiff. There  
22 are no sonograms, no monthly follow up appointments – there is simply no evidence that  
23  
24  
25  
26  
27  
28

1 Plaintiff was ever pregnant and certainly not within Defendant's "twins." To make matters  
2 worse, Plaintiff has since testified that she *had a miscarriage in September, predating* her  
3 filing this Order of Protection.  
4

5 Because Plaintiff was never pregnant (and could not have been pregnant from fellatio)  
6 and/or she is now alleged she miscarried prior to filing the Order of Protection, the entirety  
7 of Plaintiff's underlying Order of Protection is fraud upon the Court. Plaintiff's representation  
8 of herself in an *ex parte* filing as pregnant with Defendant's "twins" and a victim of Defendant  
9 maliciously claiming she was *not* pregnant and posting "medical" evidence online ostensibly  
10 led the Court into granting her Order of Protection.  
11

12 Plaintiff deliberately withheld from the Court that she was *not* pregnant (and/or that  
13 she had *miscarried* the feigned pregnancy (*at the time of the hearing*) and that she altered the  
14 "medical" records she alleged Defendant was anonymously sharing online (which he  
15 vehemently denies) in order to procure a judgment against Defendant. Therefore, the Court's  
16 judgment granting Plaintiff's Order of Protection on October 6, 2023 must be set aside  
17 because "fraud was practiced in the very act of obtaining it." *Bates v. Bates*, 1 Ariz.App. at  
18 168-70 (Ariz. App. 1965). Without this critical material information, neither Defendant nor  
19 this Court had the full and fair opportunity to litigate and discharge their respective duties.  
20  
21

22  
23 **Plaintiff committed fraud (intrinsic and extrinsic) when she testified before Judge**  
24 **Doody regarding a sonogram on October 25, 2023, leading Judge Doody to uphold the**  
25 **Order of Protection.** While arguably the entirety of Plaintiff's testimony regarding her  
26 alleged pregnancy was fraud, the Court explicitly indicated that it was granting the Order of  
27 Protection based on the sonogram depicted in the image inserted above. FTR Oct. 25, 2023  
28



1 at 10:01:17 (Judge: “The way you published this photo [...] it’s unflattering [...] that’s my  
2 reason for making my decision”).

3  
4 Plaintiff committed fraud when she testified as to the existence of the sonogram, which  
5 she has since admitted she altered and that the “source” of the ultrasound (either Planned  
6 Parenthood *or* SMIL) has indicated they have no records of the ultrasound ever taking place  
7 because they are fake. Plaintiff committed fraud when:

- 8  
9 a. Plaintiff testified she sent Defendant and a member of the media the  
10 sonogram depicted in the image at issue but *only* Defendant could have  
11 posted the image containing the sonogram. FTR Oct. 25, 2023 at 8:47:32.  
12  
13 b. Plaintiff testified that the main image – the one of her “pregnant” in a bra  
14 and yoga pants – had already been published online but that the sonogram  
15 was not. FTR Oct. 25, 2023 at 8:49:24. (In reality, both were published by  
16 Plaintiff on Reddit in a publicly accessible DropBox).  
17  
18 c. Plaintiff testified that she sent Defendant the ultrasound photo and  
19 ultrasound video and that she had an “ultrasound report” to accompany the  
20 July 7, 2023 sonogram. FTR Oct. 25, 2023 at 8:59:50 and 9:00:23 a.m.  
21 (Again, no ultrasound records exist – as there was never any ultrasound).  
22

23 As the Court explicitly stated that the sole reason it was upholding the Order of  
24 Protection was because of the image containing the sonogram, Plaintiff committed fraud upon  
25 the Court (extrinsic). Plaintiff withheld to the Court that she had doctored the sonogram and  
26 that the alleged ultrasound where she obtained the sonogram had never taken place because it  
27 is a fake. Therefore, the Court’s judgment upholding Plaintiff’s Order of Protection on  
28

1 October 25, 2023 must be set aside because “fraud was practiced in the very act of obtaining  
2 it.” *Bates v. Bates*, 1 Ariz.App. at 168-70 (Ariz. App. 1965).

3  
4 **IV. Defendant is entitled to his reasonable attorney’s fees in costs incurred in**  
5 **this entire action, including filing this Motion for Relief from Judgment.** Defendant is  
6 entitled to his fees and costs incurred as a result of Plaintiff’s lies and manipulations by  
7 making this malignant filing and then testifying before the Court alleging facts and  
8 circumstances now known to Defendant to be false and/or fraudulent. To be clear, Plaintiff  
9 was fully aware of the true nature and circumstances underpinning her perjurious statements  
10 and when she admitted “medical evidence.” On October 6 and October 25, 2023, she knew  
11 she was not pregnant, that she had not received an ultrasound for her alleged twin pregnancy,  
12 and that the sonogram she had proffered was created by her. Defendant had to incur significant  
13 costs and fees unraveling Plaintiff’s web of lies, which included having to defend himself  
14 against her malignant filing of the underlying Order of Protection. Defendant is entitled to  
15 his reasonable attorney’s fees and costs expended defending himself against Plaintiff and  
16 filing this Motion, pursuant to A.R.S. § 25-324.

17  
18  
19  
20 To be clear, there is absolutely no suggestion, that Plaintiff’s attorney for the Order of  
21 Protection had any knowledge that he was presenting fabricated medical records. Although  
22 Plaintiff has a history of fraud (the extent of which includes, but is not limited to, the three  
23 (3) know prior victims who have claimed they were subjected to similar false pregnancy), it  
24 was not yet fully exposed until well after this protective order proceeding.  
25  
26

27 **WHEREFORE, Defendant respectfully requests the Court:**

28 A. Dismiss the Order of Protection in its entirety, with prejudice on the basis of

1 fraud;

2 B. Grant leave to Defendant to submit a *Child Doll Affidavit*;

3 C. Award Defendant his reasonable attorney's fees;

4 D. Order such further relief as the Court deems just including appending

5 consequence to the current outstanding sanction request pending adjudication before Judge

6 Mata on June 10, 2024.

7  
8  
9 **RESPECTFULLY SUBMITTED** this 26<sup>th</sup> day of April, 2024.

10 **WOODNICK LAW, PLLC**

11 

12 \_\_\_\_\_  
13 Gregg R. Woodnick

14 Isabel Ranney

15 *Attorneys for Defendant*

16 **ORIGINAL** of the foregoing e-filed  
17 this 26<sup>th</sup> day of April, 2024 with:

18 Clerk of the Court  
19 Maricopa County Superior Court

20 **COPY** of the foregoing document  
21 delivered this same day to:

22 The Honorable Julie Mata  
23 Maricopa County Superior Court

24 **COPY** of the foregoing document  
25 emailed this same day to:

26 David Gringas  
27 Gringas Law Office, PLLC  
28 4802 E. Ray Road, #23-271  
Phoenix, AZ 85004  
David@GringasLaw.com

By: /s/ MB



**EXHIBIT “1”**



1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 Q. You are doing great. So one of the  
 2 questions I had ahead of me was you have been to  
 3 Planned Parenthood in the past 24 months?  
 4 A. Yes.  
 5 Q. And the Planned Parenthood you have been  
 6 to is Planned Parenthood Mission Viejo or whatever  
 7 the branch is there?  
 8 A. Yes.  
 9 Q. When was that?  
 10 A. That was in July of last year.  
 11 Q. July of '23?  
 12 A. '23, correct.  
 13 Q. You -- and you have no problems expanding  
 14 the HIPAA release to include Planned Parenthood  
 15 Mission Viejo July '23?  
 16 A. No.  
 17 Q. Have you seen any other providers at  
 18 Planned Parenthood in Arizona?  
 19 A. No.  
 20 Q. Just the one visit in the summer of '23  
 21 to the location in Mission Viejo?  
 22 A. Yes.  
 23 Q. Any other medical providers?  
 24 A. In the last --  
 25 Q. 24 months?

1 name begins with a Z but I just forgot --  
 2 A. .  
 3 Q. He --  
 4 A. She.  
 5 Q. Is your neurologist at Barrow?  
 6 A. Uh-huh.  
 7 Q. Yes?  
 8 A. Yes.  
 9 Q. So . You also told me you are  
 10 seeing the on-line provider, correct?  
 11 A. Correct.  
 12 Q. When was the last time you saw the  
 13 on-line provider?  
 14 A. I haven't had a video visit with that  
 15 person in maybe a year-and-a-half or two years.  
 16 Q. What other providers have you seen, let's  
 17 just look at 24 months, in the past 24 months?  
 18 A. I saw a doctor at Momdoc. I don't  
 19 recall. I saw a provider at Banner Urgent Care, I  
 20 think her name was Tamara, something with an L, and  
 21 she, I think was a -- she may have been a nurse  
 22 practitioner.  
 23 I saw a doctor at Planned Parenthood in  
 24 Mission Viejo, and -- you said how long did you --  
 25 how long?

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]





1 ultrasound?  
 2 A. I did not.  
 3 Q. Where did you get this ultrasound?  
 4 A. Planned Parenthood in Mission Viejo.  
 5 Q. So I don't know Mission Viejo well, but  
 6 is what you are suggesting that Scottsdale Medical  
 7 Imaging has a branch in Mission Viejo, California?  
 8 A. No.  
 9 Q. I'm totally confused here, I will give  
 10 you a chance here to explain how there is a  
 11 Scottsdale Medical Imaging ultrasound that you claim  
 12 came from Mission Viejo.  
 13 A. There is not, this was the -- actually  
 14 taken in Mission Viejo, this was not taken at SMIL.  
 15 Q. Why does it say SMIL on it?  
 16 A. I did change the top of that from Planned  
 17 Parenthood to SMIL, because I didn't want him to  
 18 contact the doctor.  
 19 Q. I'm showing you real clearly Bates stamp  
 20 0183, it's an ultrasound image that you are admitting  
 21 to having changed information on, is that true?  
 22 A. Just the top left, yes, the location.  
 23 Q. I'm going to ask the question again.  
 24 A. Yes.  
 25 Q. Did you change data on the -- on what has

1 been marked as Exhibit 9?  
 2 MR. KEITH: She answered the question,  
 3 Gregg. Objection, form.  
 4 BY MR. WOODNICK:  
 5 Q. Other than changing the sword SMIL on  
 6 that exhibit, did you change anything?  
 7 A. No.  
 8 Q. All right, Laura, I am going to give you  
 9 an opportunity now because we are three years into  
 10 this and a year into this case. Is this the only  
 11 document you have altered?  
 12 A. Yes.  
 13 Q. So every exhibit in this entire history  
 14 of feigned, of our position which is feigned  
 15 pregnancies, this is only document that you are  
 16 acknowledging having touched, via arts and crafts, is  
 17 CE 0183, marked for today's deposition as Exhibit 9?  
 18 MR. KEITH: Objection, form, and, Gregg  
 19 I'm going to ask you let's keep it professional in  
 20 the questions.  
 21 THE WITNESS: Yes, this is the only --  
 22 this is the only one, and I would hope that the fact  
 23 I'm admitting that would mean something.  
 24 BY MR. WOODNICK:  
 25 Q. Well, it means that you lied in an

1 exhibit. You understand that. So this is where we  
 2 go back to this issue of you being able to plead the  
 3 Fifth. You acknowledge you had a medical document  
 4 that you changed and you are telling me right now  
 5 that's the only one I have to know about?  
 6 A. Yes.  
 7 Q. What software did you use to change it?  
 8 A. Um, Adobe Acrobat.  
 9 Q. Where were you when you changed it?  
 10 A. At my house.  
 11 Q. When did you change it?  
 12 A. Whenever this was, because I didn't want  
 13 him to contact Planned Parenthood.  
 14 Q. At what point were you going to tell my  
 15 office or your own attorney that you doctored a  
 16 medical record?  
 17 A. I mean, as I said, it's my ultrasound.  
 18 It is my ultrasound.  
 19 Q. Bonnie Plater subsequently withdrew from  
 20 representing you?  
 21 A. No, Bonnie did not, I just didn't re-up  
 22 the retainer because it was \$5000 gone through in a  
 23 week.  
 24 Q. You are aware that Ms. Plater used this  
 25 exhibit in your proceedings, right?

1 A. Correct, it was my ultrasound.  
 2 Q. I want to show you Exhibit 10. I think  
 3 we have a little technology action here.  
 4 MS. RANNEY: There is actually no audio  
 5 on this, but I'm going to show it to you.  
 6 (Video playing.)  
 7 BY MR. WOODNICK:  
 8 Q. Did you see Exhibit 10, Laura?  
 9 A. Yes.  
 10 Q. That's a video dated September 5, 2023?  
 11 A. Yes.  
 12 Q. Is that yours?  
 13 A. No, I never stated that was mine. I was  
 14 asked that by Dave Neal.  
 15 Q. The Exhibit 10 which is a SMIL sonogram,  
 16 what's the identifying information on there?  
 17 A. [REDACTED]  
 18 Q. What's the other identifying information  
 19 on there?  
 20 A. GA=17w0d.  
 21 Q. So you admit that the sonogram in  
 22 Exhibit 10 is not yours?  
 23 A. Exhibit -- okay, yes, that's not mine.  
 24 Q. Okay. If I were to look at a sonogram of  
 25 this alleged pregnancy, the only place I would see



1 that from its original source would be Mission Viejo  
 2 Planned Parenthood?  
 3 A. Wait, are you talking about the -- are  
 4 you talking about the video or -- I'm -- I'm  
 5 confused.  
 6 Q. And that's fair.  
 7 Your testimony under Exhibit 10 is that  
 8 ain't you?  
 9 A. Exhibit 10 is, is that -- yes, correct.  
 10 Q. How many sonograms have you had for this  
 11 alleged pregnancy?  
 12 A. One.  
 13 Q. Where was it?  
 14 A. Planned Parenthood Mission Viejo.  
 15 Q. So I'm going to ask my question again.  
 16 If I were to want the original source of the  
 17 sonogram, the only sonogram that you took in a six or  
 18 seven-month pregnancy, I could only get it from the  
 19 source at Mission Viejo Planned Parenthood?  
 20 A. Yeah, and I did go anonymously.  
 21 Q. Oh. So if I issue a subpoena to them,  
 22 because you are going to sign a consent when we bring  
 23 this to Judge Mata's attention, they are not going to  
 24 know it was you that was there?  
 25 A. I self-paid. I mean, I don't know.

1 Q. Okay. So I'm going to give you an  
 2 opportunity again, because you have got statements  
 3 under oath that we are about to get to from the prior  
 4 proceedings, you do not have to answer my questions,  
 5 you can always plead the Fifth.  
 6 Your testimony now is that the sonograms  
 7 that I just presented to you are not yours; correct?  
 8 A. The one sonogram was mine.  
 9 Q. And it came from Mission Viejo, but  
 10 Mission Viejo is not going to have any idea it was  
 11 you because you did it anonymously but then you went  
 12 back and you added your name to it?  
 13 MR. KEITH: Objection, form.  
 14 THE WITNESS: No, I didn't add my name to  
 15 it, my name was on it. I changed the SMIL thing.  
 16 BY MR. WOODNICK:  
 17 Q. Your name was on it?  
 18 A. And I changed SMIL.  
 19 Q. Hang on for a second. You just told me,  
 20 Laura, that you were anonymous at Planned Parenthood.  
 21 A. But I changed SMIL on there. I think I'm  
 22 confused as to what you are asking.  
 23 Q. No problem. We will slow it down a  
 24 little.  
 25

1 A. And can you -- are you talking about --  
 2 can you just tell me what exhibit?  
 3 Q. Just to be clear for the record, I'm  
 4 talking about Exhibit 9.  
 5 A. Exhibit 9.  
 6 Q. That's the one that you say that you  
 7 changed and attributed to another medical provider  
 8 located in Scottsdale Arizona, correct?  
 9 A. Correct.  
 10 Q. And that's SMIL, which is an acronym for  
 11 Scottsdale Medical Imaging labs or something like  
 12 that; correct?  
 13 A. Correct, I have gone there before.  
 14 Q. You are a patient of SMIL?  
 15 A. Correct.  
 16 Q. So when I get the subpoena for the  
 17 records release from SMIL, this isn't going to be  
 18 there because they didn't do this test?  
 19 A. Correct.  
 20 Q. Because you just put their name on the  
 21 test?  
 22 A. Correct.  
 23 Q. This test, according to you, was  
 24 originated in California?  
 25 A. Correct.

1 Q. And you went in there anonymously?  
 2 A. Correct, and I -- yeah, I added my name  
 3 in the -- in the facility name, correct.  
 4 Q. So we are changing your testimony, so  
 5 it's not -- you originally said you just changed and  
 6 added the word SMIL, but now under oath you are  
 7 saying you added your name to it too; correct?  
 8 A. Correct.  
 9 Q. And your date of birth?  
 10 A. Yeah, I changed the top. My date of  
 11 birth actually they -- I think they may have had my  
 12 date of birth. They may have had my date of birth  
 13 there. They may have had that. If you were to get  
 14 the record, they may have my date of birth because  
 15 they did ask my age.  
 16 Q. When you submit records to a court, you  
 17 understand that you are signing a verification with  
 18 them and that there's an expectation of honesty?  
 19 A. Yes, and I don't believe this was ever  
 20 submitted to court.  
 21 Q. All right. I'm not done with Exhibit 9  
 22 yet.  
 23 Your testimony now that we have worked  
 24 through it a little bit is the entire top section of  
 25 Exhibit 9 is an ultrasound from Planned Parenthood in



1 California where you appeared anonymously, you took  
 2 that ultrasound and you added your name and a date  
 3 and information to it?  
 4 A. The date is correct.  
 5 Q. Okay. Where is the original of this?  
 6 A. Um, I mean, I just have that. I mean,  
 7 I'm sure I would have it on my computer.  
 8 Q. Okay, what would you have on your  
 9 computer?  
 10 A. Like the image, my photos.  
 11 Q. How did Planned Parenthood California  
 12 Mission Viejo give you this image?  
 13 A. I asked them to send it to me.  
 14 Q. Via?  
 15 A. Maybe I actually just took a screen grab  
 16 of it. No, doesn't look like that. I don't recall.  
 17 Q. Do they do -- I'm not familiar with  
 18 Mission Viejo Planned Parenthood, do they do like a  
 19 medical records portal?  
 20 A. No, they did not.  
 21 Q. Did you walk out of Planned Parenthood  
 22 with this?  
 23 A. With what?  
 24 Q. Whatever this image is that you doctored,  
 25 did you walk out with it?

1 A. Well, I didn't -- are you referring to  
 2 doctoring in terms of the top?  
 3 Q. Yes.  
 4 A. Okay. Um, I mean, I didn't -- I didn't  
 5 alter the ultrasound image, and this is even reviewed  
 6 by another doctor independently.  
 7 Q. We can debate that. But this particular  
 8 image, how did you get it?  
 9 A. I -- I -- I thought I had taken a picture  
 10 with my phone, but it doesn't look like it was taken  
 11 with my phone. So I don't recall.  
 12 Q. So you may have -- your position would be  
 13 you were in Planned Parenthood, you took a screen  
 14 shot with your cell phone and that, and then you came  
 15 back to Phoenix and you used Photo Shop to change the  
 16 caption?  
 17 A. I used Adobe Acrobat to change the  
 18 caption, yes.  
 19 Q. How would you get me the original of what  
 20 this was before you messed with it?  
 21 A. I can contact Planned Parenthood to see  
 22 if, from the day I was there if there are records  
 23 from there.  
 24 Q. So you would be willing to, for my  
 25 office, sign not just a HIPAA release, but a special

1 waiver that California may require because of their  
 2 confidentiality laws with their Planned Parenthood  
 3 and privacy, so that I could have that original  
 4 information, right?  
 5 A. Um, I mean, I don't know what rights I  
 6 would be waiving in California.  
 7 Q. Well, you want Judge Mata to have the  
 8 original records in front of her, correct?  
 9 A. Judge Mata will see I was pregnant, I  
 10 have other pregnancy records as well.  
 11 Q. This is not a debate. This, in  
 12 particular Exhibit 9, you have provided and you have  
 13 acknowledged --  
 14 A. To Clayton, yes.  
 15 Q. To Clayton. I have got it, too, it's  
 16 right in front of me.  
 17 You acknowledge you made changes to this  
 18 document, correct?  
 19 A. Correct.  
 20 Q. And you acknowledge that it's important  
 21 that we know what the original was of this document  
 22 to know what you changed?  
 23 A. Correct.  
 24 Q. Because right now I got to take your word  
 25 that it's the original, right, because there's no

1 verification.  
 2 A. Correct.  
 3 Q. So you are going to work with my office  
 4 to contact Mission Viejo and get the original source  
 5 material from their data base, whatever it is, so we  
 6 can see what this image looked like before you --  
 7 whatever you did to it. Can we agree to that?  
 8 A. Like I said, I went anonymous, but I'm  
 9 happy to help you guys however I can.  
 10 Q. Why did you go anonymous?  
 11 A. Because I didn't want people to know I'm  
 12 pregnant at the time.  
 13 Q. But Planned Parenthood is privileged, you  
 14 have been there before.  
 15 A. I had been there before, but I didn't  
 16 want anyone to find out because I wasn't in a  
 17 relationship or anything.  
 18 Q. You understand why people may think you  
 19 may be lying about this Exhibit 9, right?  
 20 A. I do, yes.  
 21 Q. Okay, let's move on.  
 22 I'm going to move on and show you Exhibit  
 23 10.  
 24 A. Was 10 the video?  
 25 Q. Yeah. You saw the video, the September

**EXHIBIT “2”**

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

FC 2023-052771

10/25/2023

HONORABLE JOHN R. DOODY

CLERK OF THE COURT  
T. Sachse  
Deputy

IN RE THE MATTER OF

██████████

JOSHUA A LOPEZ

AND

CLAYTON RAY ECHARD

CLAYTON RAY ECHARD  
6855 E CAMELBACK RD # 7002  
SCOTTSDALE AZ 85254

COMM. DOODY

MINUTE ENTRY

There is a *LATER* at the end of this minute entry.

Prior to the commencement of today's proceedings, Plaintiff's Exhibits 1 through 18 and Defendant's Exhibits 19 through 51 are marked for identification.

Courtroom 101-NER

8:32 a.m. This is the time set for Hearing on Order of Protection issued on October 6, 2023. Plaintiff, ██████████ is present with the above-named counsel. Defendant, Clayton Ray Echard, is present on his own behalf.

A record of the proceedings is made digitally in lieu of a court reporter.

██████████ and Clayton Ray Echard are sworn.

The Court addresses previous motions filed by Plaintiff.

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

FC 2023-052771

10/25/2023

**IT IS ORDERED** denying Plaintiff's Motion Requesting That the Hearing be Closed From the Public or That This Hearing Be Closed From Watching Online, filed October 25, 2023 and denying Plaintiff's Motion Requesting [REDACTED] Attend Virtually or Telephonically for Hearing Scheduled October 25, 2023, filed on October 25, 2023.

Counsel for Plaintiff presents opening statements.

[REDACTED] testifies.

Plaintiff's Exhibits 1 and 11 are received into evidence and Exhibit 52 is marked for identification and received into evidence.

Clayton Ray Echard testifies.

Defendant's Exhibits 34, 35, and 51 are received into evidence and Exhibit 53 is marked for identification and received into evidence.

Discussion is held.

Based on the testimony and matters presented,

**THE COURT FINDS** by a preponderance of the evidence that there is reasonable cause to believe that Defendant has committed an act of domestic violence within the last year.

**THE COURT FURTHER FINDS** that good cause exists to continue the Order of Protection in this case.

**IT IS ORDERED** that the Order of Protection issued at Superior Court on October 6, 2023 shall remain in full force and effect.

**LET THE RECORD FURTHER REFLECT** that the parties receive a copy of the aforementioned document in open court.

**LET THE RECORD FURTHER REFLECT** that Plaintiff's Exhibits 2 through 10, 12 through 18 and Defendant's Exhibits 19 through 33, and 36 through 50 are disposed.

Counsel for Plaintiff makes an Oral Motion to withdraw from these proceedings.

**IT IS ORDERED** granting Counsel's Motion to withdraw.



SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

FC 2023-052771

10/25/2023

10:13 a.m. Hearing concludes.

**FILED:** Hearing Order

LATER:

**LET THE RECORD REFLECT** that the Court did not invoke the Brady Order due to the fact that it is still undetermined if Plaintiff is pregnant with Defendant's child.

All parties representing themselves must keep the Court updated with address changes. A form may be downloaded at:

<http://www.superiorcourt.maricopa.gov/SuperiorCourt/LawLibraryResourceCenter/>

**EXHIBIT “3”**





Posted by u/TheOneandOnlyJenn 12 hours ago

26

## How to win the scariest costume contest



SHIT POST 



Sorry, this post has been removed by the moderators of r/BachelorNation.

Moderators remove posts from feeds for a variety of reasons, including keeping communities safe, civil, and true to their purpose.



**EXHIBIT “4”**



GINGRAS LAW OFFICE, PLLC

4802 E. Ray Road #23-271, Phoenix, AZ 85044 • Tel: (480) 264-1400

April 25, 2024

VIA EMAIL  
& U.S. Mail

Mr. Gregg Woodnick, Esq.  
[REDACTED]

Re: [REDACTED] v. Echard, Case FC2023-052771 (OOP Matter)

Dear Gregg,

This letter serves as written notice to you pursuant to Rule 26(c)(2)(B) that [REDACTED] intends to bring a motion under Rule 26(c)(3) asking the court to sanction you for the pleading you filed on March 25, 2024 entitled "Motion for Relief from Judgment Based on Fraud". As explained below, the motion you filed violates Rule 26(b) in multiple different ways.

**SUMMARY OF SPECIFIC ISSUES**

The most serious violation in your motion is the number of knowingly false statements of fact it contains. At this point in the case, you cannot claim that these statements are simple mistakes or that you did not have enough information to know the truth. In addition, the sheer number of factual misstatements make it appear you are intentionally trying to defraud the court by advancing a narrative that you know, or reasonably should know, is completely and totally false.

Below is a list of the specific false factual statements contained in the motion, and to be clear – I draw a distinction between an allegation that you *claim* is true but which you know is disputed and unproven, and a representation where you avow something has been factually established and is no longer disputed.

In other words, I have no problem with you saying "Clayton *claims* [REDACTED] was never pregnant". That is an accurate statement of the case, same as if I file a pleading which says: "[REDACTED] claims Clayton raped her." Accurate summaries of disputed allegations are always OK.

But I do have a serious problem with you making an unqualified representation to the court that "[REDACTED] was never pregnant" *as if that has actually been established as fact*. Accurate statements about the disputed claims are fair. False representations about the facts are not.

Having said that, I believe the following statements violate Rule 26(b)(3) because they constitute statements of fact which you present as being established facts when you know they are heavily contested and, in some aspects, have already been shown to be completely false:

- 1.) “Plaintiff was never pregnant by Defendant”; Mot. at 2:1–2

This statement violates the rule because it is presented as a statement of fact, but you know it has never been proven to be true. You also know the statement is directly contradicted by extensive evidence including no fewer than five (5) pregnancy tests taken before the case was filed, multiple pregnancy tests taken after the case was filed, and at least one pregnancy test taken in front of Mr. Echard using a test that he purchased and provided to [REDACTED]. You also know this statement is directly refuted by the expert opinion of Dr. Medchill.

- 2.) “Plaintiff has provided no verifiable medical evidence to support her alleged twin pregnancy”; Mot. at 2:14–15.

This statement violates the rule because you know it is factually false. [REDACTED] has provided *extensive* evidence, some of which is attached to Dr. Medchill’s expert report. [REDACTED] has also testified under oath about these issues, and she has provided an affidavit (attached to Medchill’s report) explaining and summarizing the extensive medical evidence supporting her claim. I understand you do not *accept* this evidence as conclusive, but that it entirely different than telling the court that no evidence exists, when you know it does.

- 3.) “To date, every obstetrician and gynecologist ... have indicated they have no records as she was never seen as a patient.” Mot. at 2:18–21.

This statement violates the rule because you know it is factually false. It also violates the rule because you intentionally omit additional information in order to make the statement misleading.

In terms of falsity, as you know [REDACTED] has produced medical records from MomDoc (an OB/GYN facility) showing she was seen there as a patient on November 14, 2023. If you somehow missed this, those records (which I believe were previously disclosed before I got involved) are attached to Dr. Medchill’s report as shown below.

| INDEX OF EXHIBITS |                                            |                   |
|-------------------|--------------------------------------------|-------------------|
| Exhibit           | Description                                | Date              |
| 1                 | Pregnancy Test at Banner Health            | June 1, 2023      |
| 2                 | Images of Tissue Discharged                | July 23, 2023     |
| 3                 | Barrow (Zieman) Visit Summary              | October 11, 2023  |
| 4                 | Barrow Epilepsy Pregnancy Specialist Appt. | October 17, 2023  |
| 5                 | HCG test – Sonora Quest                    | October 17, 2023  |
| 6                 | MomDoc Records                             | November 14, 2023 |



Mr. Gregg Woodnick, Esq.

April 25, 2023

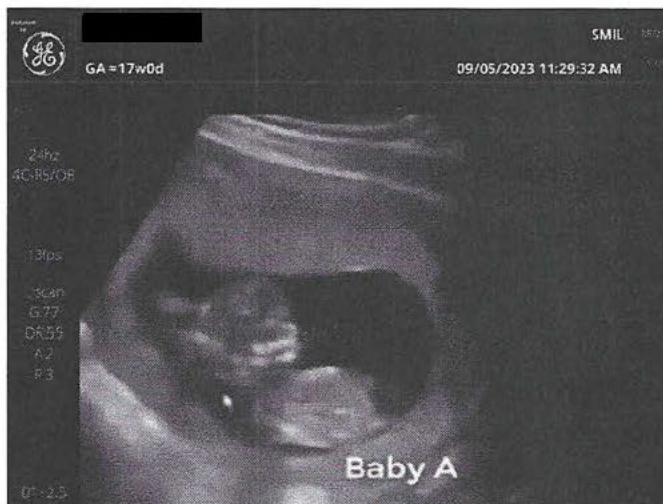
Page 3 of 4

Your statement also violates the rule because it fails to explain you have received confirmation from other OB/GYNs (such as Dr. Makhoul) confirming that ██████ made appointments to receive care, but she had to cancel for totally benign reasons such as testing positive for COVID. *See* CE0219–220. That omission clearly was intended to create a false impression that there was *zero* evidence that ██████ ever sought any care from anyone, and that she had no valid explanation for why she did not keep various appointments. Those implications are completely and totally false.

- 4.) “Further emphasizing the extreme fraud on this court ... other ‘sonograms’ of the alleged ‘twin’ pregnancy ... curiously match up with sonograms and YouTube videos posted from years ago *online*.” Mot. at 3:3–6.

This statement violates Rule 26 because it falsely implies there is *any* evidence to show ██████ created a fake sonogram using an old YouTube video. You know that is 100% false.

As you know, the facts are as follows – Dave Neal previously disclosed an alleged “video” of a sonogram with ██████’s name on it. My understanding is this was an exhibit at ██████’s deposition (it was a file marked: Exhibit 9 - Sonogram Video SMIL (9.5.23).mov) and a screenshot is shown below. I believe this is the “YouTube” video you mentioned in your motion.



██████ testimony about this point has never wavered – she says Dave Neal sent it to her after he *claimed* to have received it from an anonymous source. ██████ asked Dave to disclose the source, and he never did. Based on this, ██████’s belief is that Dave (or someone working with him) created the fake video in an effort to smear ██████ and help Clayton. That will obviously part of the defamation lawsuit ██████ plans to bring against both Clayton and Dave, and others, once this matter is over.

Mr. Gregg Woodnick, Esq.

April 25, 2023

Page 4 of 4


In any event, your statement to the court regarding the sonogram video clearly omits the full context of the video. In doing so, you falsely imply [REDACTED] had something to do with creating this fake video and/or that you have a good faith basis to believe evidence exists showing she created this. She has flatly denied creating it, and you have no evidence whatsoever to show that she did.

Taken as a whole, it is clear your assertions and representations in the motion go *far, far* beyond zealous advocacy. You are simply lying to the court about the facts and the evidence in an attempt to help your client. That is unacceptable.

In sum, I have no problem with you advocating zealously on behalf of Clayton just as I am trying to do with [REDACTED]. However, there are limits on such advocacy. You are not allowed to make knowingly false statements to the court, and you are not allowed to withhold information in an attempt to mislead the court.

The motion you filed clearly violates both of those standards, and it represents a clear violation of Rule 26. Accordingly, I demand that you withdraw or correct the motion within 10 court days from today. If you choose not to do so, I will seek sanctions and other relief from the court.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "David S. Gingras", with a long horizontal line extending to the right.

David S. Gingras, Esq.



1747 East Morten Avenue, Suite 205  
Phoenix, AZ 85020

(602) 449-7980

(602) 396-5850

office@woodnicklaw.com

www.woodnicklaw.com

WL WOODNICK LAW PLLC

April 26, 2024

**SENT VIA-EMAIL ONLY**

David Gringas  
Gingras Law Office, PLLC  
4802 E. Ray Road, #23-271  
Phoenix, Arizona 85044  
david@gingraslaw.com

**RE: [REDACTED] v. Clayton Echard**  
**Maricopa County Superior Court**  
**Case No. FC2023-052114**

David,

The upcoming trial is very simple and the relentless emails and demands are only creating more legal work for naught and do not help. I am very uncomfortable with the aggressive way you are litigating this, sharing pleadings on your Blog, and the Twitter battles. I have expressed my concerns with some of the things you have said and am doing my level best to remain focused on what should be a simple evidence presentation to Judge Mata.

I strongly disagree with your Rule 26 analysis, and I regret withdrawing Clayton's Motion for Sanctions. My intention in withdrawing it was to keep the focus on the simple facts of the case. I thought it would encourage your camp to tone down the rhetoric and toxicity. Obviously, that did not happen.

As stated in the response to your sardonic "lunch" motion, I am willing to discuss issues pertaining to trial process with you but only with a neutral third-party present. I am not comfortable with how you communicate and had hoped that your prior apology after the *ad hominem* commentary would have changed that. It has not. This is Clayton and [REDACTED] case, not ours.

**As for your letter and 10-day demand, I am responding briefly to the four (4) salient issues.** If you choose to file for Rule 26 Sanctions, we will respond and let the court adjudicate the matter. The underlying Motion at issue used limiting language that was perhaps *inartful* but certainly not malignant or violative of Rule 26. Although I do not

owe you an explanation, I am documenting our position and asking again that you to stop the hostile litigation.

1. **“Plaintiff was never pregnant by Defendant”** is a factual contention with evidentiary support based on belief formed after reasonable inquiry. *To wit:* Clayton’s sincere and credible and unambiguous denial of vaginal intercourse or conduct that could have caused pregnancy. Only █████ has ever mentioned there being any sort of penetrative conduct and her narrative has widely shifted (from his “fluids” being “down there” after she performed oral sex to him being too high to remember penetration to now an absurd claim of rape). Clayton’s assertion that █████ could never have been pregnant by him remains the same.
2. **“Plaintiff has provided no verifiable medical evidence to support her alleged twin pregnancy”** is a factual content with evidentiary support based on review of the disclosures she provided. “*Verifiable*” medical evidence is an important qualifier here because it limits the scope of the contention to evidence that can be proven accurate to a reasonable degree of scientific certainty and evidentiary scrutiny. Recall, we have still not received *any* confirmation that █████ had a sonogram done on 7/2 at Planned Parenthood and have, in fact, received records indicating all she had was a telehealth appointment at the end of June (which aligns with her various emails to Clayton and Clayton’s father regarding the same). The MomDoc records support the absence of pregnancy and say nothing about whether a pregnancy ever existed.
3. **“To date, every obstetrician and gynecologist have indicated they have no records as she was never seen as a patient”** is a factual content based on the information she provided (and lack thereof). Making an appointment that was not kept with Dr. Makhoul or Dr. Higley does not constitute being “seen as a patient”. For the MomDoc records, the statement also functions as a denial of factual contention “warranted on the evidence” per Rule 26(b)(4) (i.e., we denied her factual contention she was seen as a patient by an ob/gyn based on the totality of evidence and her being seen by MomDoc for a non-pregnancy related pap smear is not her being seen as a patient for pregnancy, including the fact she alleged before we filed the motion that she miscarried months earlier).

To the extent this does not address her being seen at MomDoc for non-pregnancy related medical treatment, we will amend the motion to clarify that--months after █████ claimed she miscarried--she was seen on November 14, 2023 at MomDoc who confirmed she was not pregnant.

4. The fourth statement about the “sonograms” “**curiously matching up with sonograms and YouTube videos posted from years ago online**” is a factually accurate contention. They very much match up. █████ was presented with this

evidence during her deposition. See also the 5<sup>th</sup> supplemental disclosure statement, which includes the email your client sent to Steve Carbone (Reality Steve) from her email with the same sonogram attachment. She sent the same video to Clayton in October and said “...*here is my 100000000% real ultrasound VIDEO.*” I appreciate that your client claims everything she said or sent to others that does not comport with her new narrative must be crafted by someone else or AI, but that is an argument she can make to the judge.

We will be filing the amended Motion in due course consistent with your request for the same.

Very truly yours,  
WOODNICK LAW, PLLC



---

Gregg Woodnick



10/6/2023 @ 10:43AM  
A. Deputy

Superior Court of Arizona/AZ007035J/0700 18380 N. 40th St Phoenix, AZ 85032  
602-506-7353 Monday - Friday 8am - 5pm

|                                                                                 |                                                                     |                                     |                                                                                                                                                                                     |
|---------------------------------------------------------------------------------|---------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Plaintiff<br>[REDACTED]                                                         | <input type="checkbox"/> Employer-Plaintiff if Workplace Injunction | Defendant<br>Clayton Ray Echard     | Case No.<br>FC2023-052771                                                                                                                                                           |
| <input type="checkbox"/> On behalf of minor/person in need of protection named: |                                                                     | Defendant's address<br>[REDACTED]   | PETITION for:<br><input checked="" type="checkbox"/> Order of Protection<br><input type="checkbox"/> Injunction Against Harassment<br><input type="checkbox"/> Workplace Injunction |
| Agent's name (if Workplace Injunction)                                          |                                                                     | Defendant's birth date<br>4/29/1993 |                                                                                                                                                                                     |
|                                                                                 |                                                                     | Defendant's phone<br>[REDACTED]     |                                                                                                                                                                                     |

This is NOT a court order.  
This petition contains Plaintiff's allegations and requests. To see what the court has ordered, see "Order" form.

**DIRECTIONS: Please read the Plaintiff's Guide Sheet before filling out this form.**

1. **Defendant/Plaintiff Relationship** (Choose the options that best describe your relationship to the defendant. \*If you are applying on behalf of another person, choose the relationship between the other person and the defendant)

- |                                                                                       |                                                                                                              |
|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Married (past or present)                                    | <input type="checkbox"/> Related as parent, grandparent, child, grandchild, brother, sister (or in-law/step) |
| <input type="checkbox"/> Live/lived together as intimate partners                     | <input type="checkbox"/> Live/lived together but not as intimate partners                                    |
| <input type="checkbox"/> Parent of a child in common                                  | <input type="checkbox"/> Other (describe):                                                                   |
| <input checked="" type="checkbox"/> One party is pregnant by the other                |                                                                                                              |
| <input checked="" type="checkbox"/> Romantic or sexual relationship (past or present) |                                                                                                              |

2.  If checked, Defendant and I have a pending action involving maternity, paternity, annulment, legal separation, dissolution, custody, parenting time, or support in Maricopa County Superior Court, Case # FC2023-052114.

3. Name of court, if any, in which any other protective order related to this conduct has been filed.  
Court name Case #

4. Tell the judge what happened and why you need this order. PRINT both the dates and a brief description of what happened. If there is a contested hearing, a judge can consider only what you write here.

**NOTE: Defendant will receive a copy of this petition when the order is served.**

| Approx. Date | (Do not write on back or in the margin. Attach additional paper if necessary.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6/1/2023     | Clayton has sent threatening messages since discovering I was pregnant, such as: I legitimately hate you right now. my hatred will only grow if you decide to put me through all of this. My animosity would last for a lifetime and that's not something either of us want to subject ourselves to. One thing about me is when I make up my mind for good, especially when it's rooted in anger, I don't sway. Ever My hate is toward you and you only. if you decide to not take plan B and in the wild event that you are pregnant, I would hate you even more. |
| 9/21/2023    | Clayton Echard was The Bachelor and has many diehard loyal fans. He and I are involved in a very public paternity case that is being covered by every major media outlet. Clayton posted to a story to his 270k followers to look me up, which they have, and I have been sent threatening and harassing messages by his followers. I explained this to him and asked him to take down the post, which he did not. By posting personal and sensitive information about me publicly (and without my consent), he has made me feel humiliated and embarrassed.       |

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9/21/2023 | Scottsdale PD Officer Vince Johnson called Clayton to explain that what he was doing was harassment in and of itself, coupled with the fact that he was inciting his followers to harass me as well. Despite this call, Clayton still did not take down the post.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10/5/2023 | Between 9/22 and 10/5, Clayton has posed as several users on Reddit, including [REDACTED], [REDACTED], [REDACTED], and others. He has posted private and confidential information, including facts about my medical history, that is known only to him because of our paternity case. This is why it is 100% traceable back to him. He has also been writing defamatory and very hurtful things about me, including comments about how I have gained weight (I am pregnant), how I am not attractive, how my photos are so poorly edited that it is laughable, how I am bad at my job (a self-help podcaster), and how my prior abusive relationship, which inspired a TEDx talk, never happened, despite mountains of evidence. He is doing everything in his power to ruin and hurt my reputation. As a result of what he has posted, I have gotten harassing messages that have told me to harm myself as a result of becoming pregnant with his twins. I am getting other threatening messages as well, and all of this attention from the general public that he has incited is very much unwanted. As a result of this public shaming, he has caused me extreme psychological harm and disrupted my peace. I have asked Clayton to stop the harassment on Reddit and social media so many times, but he won't. I have reported his accounts and posts to Reddit, but he continues to write unacceptable, cruel things about me. He has multiple accounts now and so even if one is blocked, he can create another one. As a result of him spreading false and damaging information under pseudonyms, I feel demeaned, humiliated, and like my deepest sense of privacy has been invaded. In addition, he has been in communication with my ex, who I have an order of protection against, and who he knows is dangerous. I have asked him to stop talking to him because it will put me in danger, but he continues to communicate with him. |
| 10/6/2023 | When combined, all of this has led me to feel extreme anxiety and fear for my safety. I have not left my house since September 28th because of this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

5. The following persons should also be on this order. They should be protected because Defendant is a danger to them:

6. Defendant should be ordered to stay away from these locations at all times, even when I am not present.  
NOTE: Do not list confidential addresses here.

- Residence (confidential)
- Work/Business
- School/other

7.  Defendant owns or carries a firearm or other weapons.  
 Defendant should be ordered NOT to possess firearms while this order is in effect because of the risk of harm to me or other protected persons.


8.  Defendant should be ordered to stay away from any animal that is owned, possessed, leased, kept or held by me, Defendant, or a minor child living in either my household or Defendant's household.

9. Other requests: No cyberharassment or cyberbullying under real name or pseudonyms.;

Under penalty of perjury, I swear or affirm the above statements are true to the best of my knowledge, and I request an Order / Injunction granting relief as allowed by law.

/s/ [REDACTED]  
\_\_\_\_\_  
Plaintiff

Attest:

  
\_\_\_\_\_  
Judicial Officer/Clerk/Notary

10/6/2023  
\_\_\_\_\_  
Date